



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: October 23, 1984

TO: Division File

FROM: Craig J. Liska

SUBJECT: 0316500003 - Cook County - Sherwin Williams
ILD 005456439 - Subpart F Inspection

EPA Region 5 Records Ctr.



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IEPA-DLPC

An inspection of the subject site was conducted on October 23, 1984. The purpose of the inspection was to determine the facility's degree of compliance with the Groundwater Monitoring requirements under the 35 Illinois Administrative Code 35 Ill. Admin. Code, Part 725 Regulations, Subpart F. Daryl Baker, Environmental Engineer for Sherwin Williams was contacted at the time of the inspection.

Sherwin Williams operates two surface impoundments that they have determined to be subject to Subpart F requirements. The facility utilizes these impoundments for pretreating their wastewater prior to discharging to the Metropolitan Sanitary District. The facility claims that a portion of their spent-product such as para-cresol and alkali blue enters the pond; however, the MSD discharge and the sludge on the bottom of the ponds are apparently non-hazardous. For a short period of time prior to RCRA, the ponds accepted waste streams that may at this time be considered hazardous due to lead content and pH. The pH of the current influent borders very closely on being hazardous. The two impoundments were constructed using a five foot layer of compacted clay for the seals and a layer of riprap on the clay for the purpose of seal erosion prevention.

Last year's inspection revealed the following deficiencies: 1) Insufficient number of adequate down-gradient monitor wells; 2) facility has not developed a sampling and analysis plan; 3) facility has not developed an outline describing a groundwater quality assessment program; 4) facility has not submitted an evaluation of the groundwater surface elevations annually; 5) facility records were lacking information necessary for thoroughly evaluating the monitoring system - site water table (potentiometric) contour map and regional hydrogeologic map. The problem of insufficient downgradient wells, being the most serious, was addressed first by installing two additional wells, G 108 and G109, on December 6, 1983. The current system now consists of upgradient well G101 and downgradient wells G102, G108 and G109. The facility supplied the Agency with a copy of their sampling and analysis plan on March 2, 1984. A copy of their assessment outline was received on April 6, 1984. The facility decided to obtain monthly water level measurements beginning in December, 1983. Water level readings are being taken from several additional wells (non-RCRA) to better evaluate the potentiometric surface on the facility property. The facility has also supplied the Agency with a regional hydrogeologic map and a site potentiometric map.

At the time of this inspection, the facility appeared to be in general compliance with Subpart F requirements. The facility was in the detection mode of monitoring, in the process of finalizing their Student's T-Test. The statistical comparison was only to be performed on wells G101 and G102 due to the insufficient background data on G108 and G109. Wells G108 and G109 have three consecutive quarters of background data as of their June 5, 1984 sampling. The facility completed their fourth quarter background for G101 and G102 on December 20, 1983. The June 5, 1984 results are to be used for the statistical comparison on these wells. Mr. Baker stated that he was currently working on the statistical comparisons. He explained that the delay was partially due to their lab and his own misunderstandings of the new chemical analysis form. He also stated that his preliminary results indicate that there may be a significant increase in specific conductance and TOC in G102. The completed statistical comparison should be submitted to the Agency within one week.

cc: Northern Region
Mark Haney
CJL